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January 17, 2020

VIA, ELECTRONIC FILING

The Honorable Jocelyn Boyd
 Chief Clerk/Executive Director
 Public Service Commission of South Carolina
 101 Executive Center Drive, Suite 100
 Columbia, South Carolina 29210

Re: • Notice of Generic Workshop on Filing Requirements for Integrated Resource Plans **and** Competitive Procurement Programs - Docket Nos. 2019-224-E; 2019-225-E; 2019-226-E; 2019-227-E and 2019-365-E

Ms. Boyd:

The South Carolina Solar Business Alliance, Inc., (“SCSBA”) is writing in support of the January 17, 2020, recommendations submitted to this Commission by the Southern Environmental Law Center (“SELC”), on behalf of its clients in response to questions and concerns raised by Duke Energy’s counsel’s correspondence to this Commission of January 14, 2020, regarding the upcoming generic workshop on Act 62 Integrated Resource Planning (“IRP”) filing requirements.

Consistent with SCSBA’s June 19, 2019 IRP comments filed with this Commission and in light of the concerns raised in Duke Energy’s correspondence, the SCSBA maintains that a generic docket should be established for purposes of adopting a uniform set of IRP requirements to clarify and support implementation of the recently updated statutory language in Act 62.¹ As also noted by SELC, it is SCSBA’s understanding that Dominion Energy intends to file its 2020 IRP in late February in the absence of any procedural schedule having been adopted by this Commission. A February IRP filing by Dominion would, therefore, be in conflict with the Commission’s preference for additional stakeholder input on this topic.

¹ Joint comments of the SCSBA and Johnson Development Associates regarding Act 62 IRP requirements: <https://dms.psc.sc.gov/Attachments/Matter/6a8a303d-ac2d-4f81-8788-c7ec1196e148>

Competitive Procurement Workshop

Additionally, the SCSBA is further concerned that many of the same issues raised regarding the IRP workshop may also exist for the Competitive Procurement Program Workshop scheduled for January 27, 2020. Therefore, we request that the Commission delay this workshop until these questions and concerns have been resolved. It may be that a workshop format is indeed the proper vehicle for furthering stakeholder engagement on competitive procurement programs in South Carolina. However, out of an abundance of caution, SCSBA believes a delay is proper at this time.

Respectfully Submitted,
WHITT LAW FIRM, LLC

/s/Richard L. Whitt
Richard L. Whitt,
As Counsel for the South Carolina Solar
Business Alliance, Inc.

cc: All parties of record, *via electronic mail*